

**US Department of the Treasury  
Financial Management Service  
Financial Operations  
Financial Accounting and Services Division  
Financial Accounting and Services Division Accounting System  
(FASDAS)/Momentum®  
Privacy Impact Assessment (PIA)**

**Name of Project:** Financial Accounting and Services Division  
(FASDAS)/Momentum®  
**Project's Unique ID:** FASDAS  
**Bureau:** Financial Management Service (FMS)  
Financial Operations (FO)  
Financial Accounting and Services Division (FASD)

**A. SYSTEM APPLICATION/GENERAL INFORMATION:**

**1) Does this system contain any information about individuals? Yes**

**a. Is this information identifiable to the individual?<sup>1</sup> Yes**

(If there is **NO** information collected, maintained, or used that is identifiable to the individual in the system, the remainder of the Privacy Impact Assessment does not have to be completed.)

**b. Is the information about individual members of the public? Yes**

(If YES, a PIA must be submitted with the OMB Exhibit 300, and with the IT Security Certification and Accreditation (C&A) documentation).

**c. Is the information about employees? No**

(If yes and there is no information about members of the public, the PIA is required for the FMS IT Security C&A process, but is not required to be submitted with the OMB Exhibit 300 documentation).

**2) What is the purpose of the system/application?**

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<sup>1</sup> "Identifiable Form" – According to the OMB Memo M-03-22, this means information in an IT system or online collection: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification. (These data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors).

The Financial Accounting and Services Division (FASD) provides both proprietary and budgetary accounting and reporting for the Treasury Managed Accounts (TMA) and the International Assistance Programs (IAP). FMS has custodial responsibility for TMA. FMS provides an accounting service for the Office of the Assistant Secretary for International Affairs (OASIA), Department of the Treasury in regards to IAP. Following are some functions performed by FASD in conjunction with the core financial system: provide accounting operations and financial services for TMA and IAP including the Judgment Funds, Presidential Election Campaign Fund, DC Water and Sewer, the International Monetary Fund, and the Multilateral Development Banks; bill and collect amounts due from the foreign governments and federal agencies; report investment activities of the Foreign Claims deposit funds, the Esther Cattell Schmitt Gift Fund, and the Kennedy Center Revenue Bond Sinking Fund; process payments for the Judgment Funds and the Foreign Claims Programs; and make payments to federal agencies, the DC government, and the public; provide accounting and reporting for the United States' reserve position in the International Monetary Fund; provide accounting and reporting for the United States' contributions to international financial institutions; and process domestic and international letters of credit and drawdowns.

The Financial Accounting and Services Division Accounting System (FASDAS)/Momentum®, a commercial off-the-shelf (COTS) core financial system provided by CGI-Federal, performs all of the accounting and budgeting functions related to FASD activities. FASDAS has an interface with the Judgment Fund System. FASDAS replaced GLOWS the accounting system that was used since the fall of 1998.

FASDAS/Momentum® is compliant with the Joint Financial Management Improvement Program (JFMIP) standards.

### **3) What legal authority authorizes the purchase or development of this system/application?**

- Chief Financial Officers (CFO) Act of 1990 – One of the purposes of the Act was to “provide for improvement, in each agency of the Federal Government, of systems of accounting, financial management, and internal controls to assure the issuance of reliable financial information and to defer fraud, waste, and abuse of Government resources.”
- Federal Financial Management Improvement Act of 1996 (FFMIA) – “Each agency shall implement and maintain financial management systems that comply substantially with Federal financial management systems requirements, applicable Federal accounting standards, and the United States Government Standard General Ledger at the transaction level.”

- Other various legal requirements: OMB Circular A-136 (Financial Reporting Requirements); Government Management Reform Act of 1994 (GMRA); Government Performance and Results Act of 1993 (GPRA); and Federal Managers' Financial Integrity Act (FMFIA)

**B. DATA in the SYSTEM:**

**1) What categories of individuals are covered in the system?**

The public and state governments are covered in the system. The public can be individuals, businesses, corporations, and estates.

**2) What are the sources of the information in the system?**

Federal Program Agencies (FPAs) and the Department of Justice submit the information for the system. FASDAS receives claimant payment information from the Judgment Fund System. The claim information includes the name(s) of claimants, as well as the SSNs/TINs, and addresses or banking information for claimants receiving payments.

**a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?**

The source of the information is the FPA or the Department of Justice.

**b. What Federal agencies are providing data for use in the system?**

Any Federal agency can submit information.

**c. What Tribal, State and local agencies are providing data for use in the system? None**

**d. From what other third party sources is the data collected? None**

**e. What information will be collected from the employee and the public?**

The following information is collected: the name(s) of claimants, as well as the SSNs/EINs, and addresses or banking information for claimants or persons receiving payments.

### 3) Accuracy, Timeliness, and Reliability

**a. How will data collected from sources other than FMS records be verified for accuracy?**

Presently, there is no “verification” for accuracy, per se, since we are receiving certifications from the agencies to make the payments. If an agency submits incorrect RTN or address information, the financial institution or the U.S. Postal Service will return a misdirected payment.

**b. How will data be checked for completeness?** Edits at the time of on-line data submission will ensure that all required information is provided.

**c. Is the data current?** What steps or procedures are taken to ensure the data is current and not out-of-date? Name the document (e.g., data models).

The submitting agency is responsible for ensuring that address or banking information is current at the time it is provided.

**d. Are the data elements described in detail and documented?** If yes, what is the name of the document?

Refer to applicable sections of the FASDAS Functional and Data Requirements Documents for this information.

### **D. ATTRIBUTES OF THE DATA:**

- 1) Is the use of the data both relevant and necessary to the purpose for which the system is being designed?** The use of the data is relevant and necessary. Payments could not be made without this information.
- 2) Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?** No
- 3) Will the new data be placed in the individual’s record?** Not Applicable
- 4) Can the system make determinations about employees/public that would not be possible without the new data?** Not Applicable

- 5) **How will the new data be verified for relevance and accuracy?** Not Applicable
- 6) **If the data is being consolidated, what controls are in place to protect the data from unauthorized access or use?** Not Applicable
- 7) **If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access?** Explain. Not Applicable

- 8) **How is the data to be retrieved?** Does a personal identifier retrieve the data? If yes, explain and list the identifiers that will be used to retrieve information on the individual.

Data may be retrieved by means of a personal identifier such as the vendor code which is usually the payee's last name.

- 9) **What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?**

The system is not designed to produce reports on individuals. It can produce reports regarding payments made for a particular individual. Only FASDAS users have access to these reports.

- 10) **What opportunities do individuals have to decline to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent.**

The information is provided to us by FPAs. Such information must be provided if the person wants to receive a payment.

#### **E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:**

- 1) **If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?** Not Applicable
- 2) **What are the retention periods of data in this system?**

In accordance with the National Archives and Records Administration (NARA) schedule for the records related to this system (pending schedule N1-425-01-04), data will be retained in FASDAS for seven (7) years.

- 3) What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?**

This is discussed above.

- 4) Is the system using technologies in ways that the FMS has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?** No.

- 5) How does the use of this technology affect public/employee privacy?**  
Not Applicable

- 6) Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.**

FASDAS does not have the capability to locate by way of a “search” function any individual, nor can it monitor individuals.

- 7) What kinds of information are collected as a function of the monitoring of individuals?** Not Applicable

- 8) What controls will be used to prevent unauthorized monitoring?** Not Applicable

- 9) Under which Privacy Act systems of records notice does the system operate? Provide number and name.**

FMS.016 – Payment Records for Other Than Regular Recurring Benefit Payments

- 10) If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.** Not Applicable.

#### **F. ACCESS TO DATA:**

- 1) Who will have access to the data in the system?** (E.g., contractors, users, managers, system administrators, developers, tribes, other)

Data will be accessible by the FMS internal users only (i.e., no contractors). There are less than 40 internal users. IR also has access to the platform and servers for maintenance.

- 2) How is access to the data by a user determined?** Are criteria, procedures, controls, and responsibilities regarding access documented?

FASDAS defines access control policy, groups and individual user permissions based on least privilege. Access and permissions are restricted to the approved domain. Granting of initial or change in access or permissions must be accomplished in writing and approved by the FASDAS ISSO or System Administrators.

- 3) Will users have access to all data on the system or will the user's access be restricted? Explain.**

FASDAS users will have restricted access to data. Access and permissions are restricted to the approved domain. Granting of initial or change in access or permissions must be accomplished in writing and approved by the FASDAS ISSO or System Administrators.

Roles have been defined and are used to grant access to each user. Specific roles have been defined for administrators, data entry operators, accountants, and reviewers. Active auditing of system and application access and the use of individual UserIDs allow enforcement of individual accountability and traceability of user actions.

- 4) What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?** (Please list processes and training materials)

FASDAS uses several associated components contained within the general support system (GSS) located at the FMS HROC facility. The GSS components provide both functionality and some security services for FASDAS.

FASDAS users complete access forms and rules of behavior before being granted access to the system. User access will be granted depending on their role in the system. Users are given a unique login identification name and then they are required to set a unique password. Both items are required for login. Audit logs are reviewed weekly to identify any unauthorized login attempts.

Roles have been defined and are used to grant access to each user. Specific roles have been defined for administrators, data entry operators, accountants, and reviewers. Active auditing of system and application access and the use of individual UserIDs allow enforcement of individual accountability and traceability of user actions.

- 5) Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system?** If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed? No

- 6) Do other systems share data or have access to the data in the system? If yes, explain.**

Yes, FASDAS has an interface with the Judgment Fund System. Payment information is imported into FASDAS and payment confirmation information is exported into the Judgment Fund System.

- 7) Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?** The FASDAS ISSOs

- 8) Will other agencies share data or have access to the data in this system (Federal, State, Local, Other (e.g., Tribal))?** No

- 9) How will the data be used by the other agency?** Not applicable

- 10) Who is responsible for assuring proper use of the data?** The FASDAS ISSOs.



